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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,

Plaintiff,

VS

JASON INGRASSIA, individually and in his official capacity; COUNTY OF CONTRA COSTA; and CITY OF SAN RAMON.

Defendants.

Case No.: 3:07-cv-02669 (CEB)(EDL)

AMENDED

STIPULATION AND PROPOSED ORDER FOR CASE MANAGEMENT SCHEDULE

WHEREAS on August 26, 2008, the parties attended a hearing before Magistrate Judge Laporte, after which the court ordered the parties to submit a proposed case management schedule pursuant to the pretrial and trial dates set by Judge Breyer:

WHEREAS Judge Breyer has set the pretrial hearing for December 2, 2008 and the trial for December 8, 2008;

WHEREAS Judge Breyer advised the parties at the case management conference on July 21, 2008 that the parties could agree upon and determine all other case management scheduling dates, aside from the pretrial and trial dates set:

1 WHEREAS counsel for the parties have met and agreed upon the proposed case
2 management schedule detailed below;

3 IT IS HEREBY STIPULATED AND AGREED that the following case management
4 schedule shall govern this case:

- 5 1. Fact discovery shall end on September 30, 2008;
- 6 2. Expert disclosures shall be hand-delivered by October 6, 2008;
- 7 3. Rebuttal expert disclosures shall be hand-delivered by October 22, 2008;
- 8 4. Expert discovery shall end on November 5, 2008;
- 9 5. All dispositive motions shall be hand-delivered by November 5, 2008;
- 10 6. Opposition papers on dispositive motions shall be hand-delivered by November 14,
11 2008;
- 12 7. Reply papers on dispositive motions shall be hand-delivered by November 19, 2008;
13 24 at 2:30 p.m.
- 14 8. Dispositive motions shall be heard on November ~~24~~, 2008; and
- 15 9. The joint pretrial conference statement shall be filed by November 25, 2008

16 Dated: August 29, 2008
17 Oakland, California

JUSTICE FIRST, LLP
18 Attorneys for Plaintiff Abhinav Bhatnagar
19 By:
20

21 _____/s/
22 Jenny C. Huang
23 2831 Telegraph Avenue
24 Oakland, CA 94609
25 Tel.: (510) 628-0695

26 Dated: August 29, 2008
27 Walnut Creek, California

MCNAMARA, DODGE et al.
28 Attorney for Defendant Jason Ingrassia
By:
29

30 _____/s/
31 Noah Blechman
32 1211 Newell Avenue
33 Walnut Creek, CA 94596-5331
34 Tel.: (925) 939-5330

1 Dated: August 29, 2008
2 Martinez, California

GREGORY HARVEY
Attorney for Contra Costa County and
the City of San Ramon
By:

4 Mr. Gregory Harvey
5 Contra Costa County Counsel's Office
6 651 Pine Street, 9th Floor
Martinez, CA 94553

7 IT IS SO ORDERED.

8 Dated: August 03, 2008

